

February 22, 2007

John Morris
Rubber and Plastic Additives Panel
The American Chemistry Council
1300 Wilson Boulevard
Arlington, VA 22209

Dear Mr. Morris:

The Office of Pollution Prevention and Toxics is transmitting EPA's preliminary comments on the revised test plan and robust summaries for the Styrenated Phenols Category (CAS Nos. 68457-74-9 and 61788-44-1) dated July 10, 2003. EPA posted the revised submission on the ChemRTK HPV Challenge Program Web site on September 1, 2004. The styrenated phenols category submission is a partial revision of the previously submitted category for the Hindered Phenols posted January 15, 2002.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

Our initial analysis focused on the overall approach including the category definition and description. We have concluded that EPA is unable to continue its evaluation for the reasons given below.

The styrenated phenols category is inadequately defined and additional clarification of the category members is required to further evaluate the submission. EPA noted the following inadequacies:

(1) There is a discrepancy between the text for the Definition of the Styrenated Phenols Category (paragraph 3, page 6) and the structures that follow it. The category is defined as having at least one alpha-methyl styrene substituent on the aromatic ring; however, the structure for styrenated phenol (CAS No. 61788-44-1) shows the substituents as styrene, not methyl styrene. The definition also states that styrenated phenol has multiple methyl styryl groups on the phenol ring (contradicting the "at least one" statement), whereas both structures allow for a single aralkyl substituent.

(2) The discussion on the manufacture of styrenated phenols (test plan, page 4) appears to have been carried over from the original Hindered Phenols test plan and has no apparent relevance in the context of this submission. An appropriate description of the manufacturing process might have helped bring attention to the discrepancies in the substance definitions.

(3) The submitter needs to note in the test plan that these substances are mixtures with potentially variable compositions. The submitter needs to provide basic composition data, including the extent of composition variation over time or production runs, because the complexity in composition could bear on the mixture's toxicity or on interpretation of the submitted data.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that the Panel advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send electronic revisions or comments to the following e-mail address: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact me at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsc hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Mark W. Townsend, Chief
HPV Chemicals Branch

cc: O. Hernandez
C. Augustyniak
J. Willis